

## MAZIE SLATER KATZ & FREEMAN, LLC

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February 20, 2021

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**VIA ECF & EMAIL**

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Hon. Thomas I. Vanaskie (Ret.)

Special Master

Stevens & Lee

1500 Market St., East Tower, Suite 1800

Philadelphia, Pennsylvania 19103-7360

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***  
**Case No. 1:19-md-02875-RBK (D.N.J.)**

Dear Judge Vanaskie:

Pursuant to the discussion during the February 17, 2021 status conference, the Parties have agreed to the following deposition schedules for the depositions of the Manufacturer Defendants:

### **ZHP AMENDED DEPOSITION DATES**

<b>No.</b>	<b>Witness</b>	<b>Date(s)</b>
1	John Iozzia	January 20, 2021 (U.S. time)
2	Lijie Wang	January 26, 2021 (U.S. time)
3	Remonda Gergis	February 2, 2021 (U.S. time)
4	Hai Wang	March 10-11, 2021 (U.S. time)
5	Minli Zhang	March 21-25, 2021 (U.S. time)
6	Peng Dong	March 28-April 1, 2021 (U.S. time)
7	Hong (Eric) Gu	April 4-5, 2021 (U.S. time)
8	Wen-Chien (Eric) Tsai	April 7-9, 2021 (U.S. time)
9	Qiangming Li	April 12-15, 2021 (U.S. time)
10	Min Li	April 19-22, 2021 (U.S. time)

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11	Jucal Ge	April 26-29, 2021 (U.S. time)
12	Lihong (Linda) Lin	May 3-6, 2021 (U.S. time)
13	Jie Wang	May 9-10, 2021 (U.S. time)
14	Yuelin Hu	May 11-13, 2021 (U.S. time) (subject to ZHP's motion for protective order)
15	Xiaodi Guo	May 17-18, 2021 (U.S. time)
16	Mi (Karen) Xu	May 19-21, 2021 (U.S. time) (subject to ZHP's motion for protective order)
17	Fenyang (Xavier) Tang	May 23-25, 2021 (U.S. time) (subject to ZHP's motion for protective order)
18	Jun Du	May 27-28, 2021 (U.S. time)
19	Baohua Chen	May 30-June 1, 2021 (U.S. time)

#### HETERO AMENDED DEPOSITION DATES

No.	Witness	Date(s)
1	Bandaru ("B.V. Rama Rao") Venkata Ramarao	March 3-4, 2021
2	Dr. Murali Nagabelli	March 9-10, 2021
3	Venkata Pravin Kumar Penubaka	March 18-19, 2021
4	Panchakshari Nanyappa Gowda	March 23-25, 2021
5	Venkataramana Madireddy	March 29-31, 2021
6	Dr. Manoranjan Kumar	April 5-6, 2021
7	Dr. B.V. Ramireddy	April 13-14, 2021
8	Ganti Jyothi	May 11, 2021
9	Yogeswar Reddy Mamilla	May 18, 2021
10	Mohan Reddy Chilukurri	May 25, 2021

#### TORRENT AMENDED DEPOSITION DATES

No.	Witness	Date(s)
1	Jocelyn Rivera	February 22, 2021
2	Saroja Gorantla	February 25, 2021
3	Kalpesh Patel	March 10, 2021
4	Dhruvit Shah	March 16, 2021
5	Reddy Neravatla	March 22, 2021
6	Maitreyee Mukherji	March 25, 2021
7	Bernadette Attinger	March 29, 2021

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8	Dawn Chitty	March 30, 2021
9	Sue Perry	March 31, 2021
10	Kelly Gegenheimer	April 14-15, 2021
11	Paras Sheth	April 21, 2021
12	Sushil Jaiswal	May 4-6, 2021

#### TEVA AMENDED DEPOSITION DATES

No.	Witness	Date(s)
1	Elizabeth Gray	February 26, 2021
2	Dan Barretto	March 10, 11, 2021
3	Stefan Karlsson	March 18, 2021
4	Narendra Vadsola	March 24, 2021
5	Kevin Galownia	Week of April 5 or 12, 2021
6	Raphael Nudelman	April 8, 2021
7	Jens Nassall	April 16, 2021 (conditional on Mr. Nassall's ability to travel out of Germany due to Covid-19)
8	Tony Binsol	May 13, 2021
9	Claire Lyons	April 27, 2021
10	Michelle Osmian	May 6, 2021
11	Pan Lin	May 11, 2021 (Conditioned on ability to travel)
12	Walton Wang	Week of May 19, 2021 (Conditioned on ability to travel)

#### MYLAN AMENDED DEPOSITION DATES

No.	Witness	Date(s)
1	Derek Glover	March 9, 11, and 12, 2021
2	Antonyraj Gomas	March 23, 2021
3	Dan Snider	March 31, 2021
4	Wayne Talton	April 6-7, 2021
5	Imtiyaz Basade	April 13, 2021
6	Katie Reed	April 16, 2021
7	Walt Owens	April 21, 2021
8	Cassandra Bird	April 27, 2021
9	Jyothibas Abbineni	May 4, 2021

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10	Reem Malki	May 12, 2021
11	Kim Kupec	May 19, 2021
12	Lance Molnar	May 26, 2021

**AUROBINDO AMENDED DEPOSITION DATES**

<b>No.</b>	<b>Witness</b>	<b>Date(s)</b>
1	Jasleen Gupta	March 12, 2021
2	Bhadresh Doshi	March 19, 2021
3	Prasad Gorijavolu	March 25, 2021
4	Blessy Johns	April 15 and 16, 2021
5	Steve Lucas	April 21 and 22, 2021
6	Sandra Martinez	April 28, 2021
7	David Palew	May 6 and 7, 2021
8	Sanjay Singh	May 19 and 20, 2021

Plaintiffs are finalizing the scheduling with Camber, which is a wholly-owned subsidiary of Hetero and has represented it was the sole U.S. distributor for Hetero, and expect that the schedule will be finalized with Camber prior to the February 24, 2021 conference. Thank you for your consideration.

Respectfully,



ADAM M. SLATER